

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in compliance with D.N.J. LBR 9004-1(b)**

**PACHULSKI STANG ZIEHL & JONES LLP**

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*Counsel to Arnold & Itkin LLP*

In re:

LTL MANAGEMENT LLC,

Debtor.<sup>1</sup>

Chapter 11

Case No. 23-12825 (MBK)

**APPLICATION FOR ORDER SHORTENING  
TIME AND CERTAIN RELATED RELIEF**

The applicant, Arnold & Itkin LLP (“Arnold & Itkin”), on behalf of certain talc personal injury claimants represented by Arnold & Itkin, by and through its counsel, having filed substantially contemporaneously with this Application its *Motion to Seal the Redacted Portions of Reply in Support of Motion of Arnold & Itkin, on Behalf of Certain Talc Claimants, to Dismiss Chapter 11 Case* (the “Motion to Seal”), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “Scheduling Order”), for the reasons set forth below:

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

1. **For the reasons set forth below, Arnold & Itkin respectfully requests that the hearing on the Motion be scheduled for June 27, 2023 at 10:00 a.m.,** or as soon thereafter as the Court's calendar permits.
2. As set forth in the Motion to Seal, Arnold & Itkin seeks to file under seal the redacted portions of the reply (the "Reply") in support of Arnold & Itkin's motion to dismiss the Debtor's chapter 11 case (the "Motion to Dismiss"). The materials sought to be sealed have been designated by the Debtor as confidential and constitute "Confidential Information" as that term is defined in that certain *Order Governing Confidential Information By and Between the Official Committee of Talc Claimants and the Debtor Pursuant to D.N.J. LBR 9021-1(b)* [Docket No. 545] (the "Protective Order").
3. Trial on the Motion to Dismiss (along with similar motions filed by other parties in interest in this case) is scheduled to begin on June 27, 2023 at 10:00 a.m. The deadline for Arnold & Itkin to file the Reply is June 23, 2023. Under this schedule, Arnold & Itkin is unable to provide the full notice otherwise required regarding the Motion to Seal.
4. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P. 9006(c)(2).

Dated: June 22, 2023

PACHULSKI STANG ZIEHL & JONES LLP

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